



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

Dwight C. Mims
Senior Vice President
Nuclear Regulatory and Oversight

Tel. 623-393-5403
Fax 623-393-6077

Mail Station 7605
P. O. Box 52034
Phoenix, Arizona 85072-2034

102-06423-DCM/GAM
October 11, 2011

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Update to the Reactor Vessel Internals Inspection Program
Commitments**

By letter no. 102-06193, dated May 13, 2010, Arizona Public Service Company (APS) submitted to the NRC an updated commitment to submit a reactor vessel internals inspection program to the NRC by January 22, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML101410260). That inspection program is to be based on the NRC-approved PWR reactor vessel internals aging management program (AMP) of Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) MRP-227.

In addition, the PVNGS Units 1, 2, and 3 license renewal application submitted with letter no. 102-05937, dated December 11, 2008, contained Commitment No. 23 in Table A4-1 to submit a reactor vessel internals inspection plan to the NRC upon completion of the industry programs for investigating and managing aging effects on reactor internals (MRP-227), but not less than 24 months before entering the period of extended operation (ADAMS Accession No. ML083510615). The period of extended operation would be entered for the first PVNGS unit (Unit 1) on June 1, 2025. The license renewal commitments have been listed in the PVNGS Updated Final Safety Analysis Report in Table 19.5-1.

This letter updates the commitments to submit a PVNGS reactor vessel internals inspection program to reflect the guidance issued in NRC Regulatory Issue Summary (RIS) 2011-17, "License Renewal Submittal Information for Pressurized Water Reactor Internals Aging Management." As an RIS 2011-17 Category B plant, the PVNGS Units 1, 2, and 3 reactor internals inspection program submittal commitments are revised as follows:

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • San Onofre • South Texas • Wolf Creek

A138
NRC

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Update to the PVNGS Reactor Vessel Internals Inspection Program Commitments
Page 2

APS will submit the PVNGS Units 1, 2, and 3 reactor vessel internals aging management program and inspection plans in accordance with MRP-227-A no later than October 1, 2012, for NRC review and approval.

Should you need further information regarding this submittal, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

Sincerely,



FOR D.C. MIMS

DCM/RAS/GAM/

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	L. K. Gibson	NRC NRR Project Manager for PVNGS
	J. R. Hall	NRC NRR Senior Project Manager
	M. A. Brown	NRC Senior Resident Inspector for PVNGS